

**UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

**Stacey Snyder
Debtor/Movant**

Case NO. 17-00280

MOTION TO RECONSIDER ORDER DISMISSING CASE AND WAIVE FEE

AND NOW, this 18th day of September 2019, the Debtor, by and through her attorney, Dawn M. Cutaia, files this Motion to Reconsider Order Dismissing Case and in support thereof states the following:

1. Debtor filed a Chapter 13 bankruptcy on January 27, 2017.
2. Debtor was in a Chapter 13 because she had non-exempt property, to wit: her residence located at 220 Country Ridge Drive in Red Lion, PA, and because she was in arrears on her vehicle payments.
3. Debtor sold her residence in her Chapter 13 case because she could no longer afford the mortgage payments and paid the Chapter 13 Trustee the balance of the non-exempt equity.
4. Debtor stayed in the Chapter 13 after the sale of her house to cure the arrears on her vehicle, but Debtor fell behind in those payments and her case was dismissed on August 9, 2019, after the Trustee filed a Certificate of Default for failure to make trustee payments.
5. After Debtor's case was dismissed she chose to return her vehicle since she could no longer afford it and was able to obtain a new vehicle with the help of a family member.
6. Debtor wishes to reopen her case and convert her case to a Chapter 7.
7. Debtor is a single mother, significantly under median (\$32,500 gross a year), and

struggling to pay her basic necessities, and she cannot afford to pay a filing fee to reinstate her case if one would normally be required.

8. Counsel for Debtor has already advised the Trustee's office of her intent to file this Motion and will seek a stipulation with the Trustee to allow Debtor's case to be converted to a Chapter 7 once the Motion is filed. Counsel does not anticipate that the Trustee's office will oppose the request.

WHEREFORE, the Debtor respectfully requests this Honorable Court reconsider its Order of August 9, 2019, dismissing her case and reinstate her case so that she can seek a stipulation with the Chapter 13 Trustee to convert her case to a Chapter 7 and waive any fee that might normally be required to reopen Debtor's case.

Respectfully Submitted,

By: /s/ Dawn M. Cutaia

Dawn M. Cutaia
Supreme Court ID 77965
Attorney for Debtor

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IN RE:

Chapter 13

Stacey Snyder

Debtor(s)

Case NO. 17-00280

ORDER REINSTATING CASE

AND NOW, upon consideration of Debtor's Motion to Reconsider Order Dismissing Case, said motion is hereby granted and Debtor's case is reinstated.